



FEDERAL ELECTION COMMISSION Washington, DC 20463

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TO:

The Commission

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SUBJECT:

MUR 6724 and P-MUR 560 (Bachmann for President, et al.)

Abeyance of Matter

These matters stem from a Complaint and a referral from the Office of Congressional Ethics alleging that Michele Bachmann's principal campaign committee, Bachmann for President, and her leadership PAC, MichelePAC, violated the Federal Election Campaign Act of 1971, as amended, by misreporting disbursements and by receiving and making, respectively, excessive in-kind contributions. According to the Complaint, Bachmann for President and MichelePAC each disguised salary payments to an advisor, then-Iowa State Senator Kent Sorenson, by routing them through C&M Strategies, Inc. ("C&M"), a one-man political consulting firm run by Guy Short, an officer of Bachmann for President and MichelePAC. Further, the Complaint and OCE Referral allege that MichelePAC made, and Bachmann for President received, excessive in-kind contributions when MichelePAC paid C&M's consulting fees (some of which were allegedly paid to Sorenson) for work in fact performed for Bachmann for President.1

The Complaint further alleges that National Fiscal Conservative PAC, a "SuperPAC" that supported Bachmann, made and the Committee received excessive or prohibited in-kind contributions in the form of a coordinated communication.

MUR 6724/P-MUR 560 (Bachmann for President, et al.) Memorandum to the Commission Page 2 of 3 Based on the foregoing, we recommend that the Commission hold MUR 6724 and P-MUR 560 in abeyance for a period of three months.

RECOMMENDATION:

Hold MUR 6724 and P-MUR 560 in abeyance for three months from the date of certification.